

**UNITED STATES OF AMERICA**

**BEFORE THE**

**DEPARTMENT OF ENERGY**

**Interstate Electric Transmission System )**

**Notice of Inquiry**

**Electric Reliability Issues )**

**COMMENTS OF THE EDISON ELECTRIC INSTITUTE**

**INTRODUCTION AND EXECUTIVE SUMMARY**

Pursuant to the Department of Energy's (DOE) Notice of Inquiry on Electric Reliability Issues (NOI),<sup>1</sup> the Edison Electric Institute (EEI) is pleased to submit the following comments.

EEI is the association of the United States investor-owned electric utilities and industry affiliates and associates worldwide. Its U.S. members serve over 90 percent of all customers served by the investor-owned segment of the industry. They generate approximately three-quarters of all the electricity generated by electric utilities in the country and serve about 70 percent of all ultimate customers in the nation. EEI members own a majority of the transmission, distribution and generation facilities in the nation and have principal responsibility for maintaining the reliability of our nation's electric system.

EEI commends DOE for highlighting the paramount importance of maintaining reliability and re-assessing the means for its assurance as the electric utility industry continues to move toward a competitive environment. EEI concurs with the conclusions reached by the Secretary of Energy Advisory Board's Task Force on Electric System

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<sup>1</sup> Department of Energy, Notice of Inquiry, 65 Fed. Reg. 69753 (November 20, 2000) (NOI).

Reliability (Task Force) that the increasing stresses on the nation's transmission grid require a new approach to maintaining bulk power system reliability, including the establishment of a self-regulatory reliability organization with the authority to set and enforce mandatory reliability standards. This conclusion also was reached by a blue ribbon panel of experts, the Electric Reliability Panel, organized by the North American Electric Reliability Council (NERC) to chart the evolution of that organization in a restructured electric industry. Both panels also concluded that federal legislation was the only way to provide necessary governmental oversight of such an organization and the means for its standards to be mandatory and enforceable.

In pursuit of that goal, EEI, along with a broad range of stakeholders which included participation by DOE, developed consensus legislative language that would provide for the formation of a self-regulatory reliability organization, to be known as the North American Electric Reliability Organization (NAERO), subject to oversight in the U.S. by the Federal Energy Regulatory Commission (FERC). NAERO would have the authority to establish and enforce mandatory reliability standards and to assess charges to cover the costs of its activities.

An early version of the NAERO legislative proposal is included in the Administration's proposed comprehensive electricity restructuring legislation – the Comprehensive Electricity Competition Act (CECA). EEI commends DOE for including the NAERO proposal, as it then existed, in the Administration's legislative proposal and for its continuing advocacy of the overall approach embodied in that language. Senator Slade Gorton introduced a stand-alone version of the NAERO proposal in the 106<sup>th</sup> Congress. That bill, S. 2071, was passed by the full Senate on June 30, 2000.

Since CECA was introduced in 1999, the stakeholder group has continued to refine the NAERO proposal, responding to several new issues that have arisen and to the rapidly changing conditions in the electric utility industry, including the promulgation of Order No. 2000 by the Commission.<sup>2</sup> Order No. 2000 establishes a critical operational role for regional transmission organizations (RTOs) in maintaining the short-term reliability of the transmission facilities under their control. In response to these provisions in Order No. 2000, the expanded stakeholder group, along with participation by Commission staff, developed language to add to the original NAERO proposal to reflect the role of RTOs. There have been several other significant changes to the original NAERO proposal, including language to deal with the respective roles of the federal government and the states as well as several changes to definitions and other provisions. Rep. Albert Wynn introduced H.R. 4941 in the 106<sup>th</sup> Congress, which includes these changes and is the most recent and complete version of the NAERO proposal.

EEI believes there are several reasons why enactment of legislation, rather than the promulgation of a rule, is essential to establish the institutions and framework necessary to assure reliability in a competitive and restructured electric industry. First, implementing a reliability scheme through regulation rather than through legislation would mean that a substantial portion of the nation's transmission system that is not subject to the Commission's jurisdiction would not be subject to such mandatory reliability requirements. Second, a rule would not provide the antitrust protection that is critical to implementation of a self-regulatory reliability organization. Third, the

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<sup>2</sup> Regional Transmission Organizations, Order No. 2000, 65 Fed. Reg. 809 (January 6, 2000), FERC Stats. & Regs. ¶ 31,089 (1999), order on reh'g, Regional Transmission Organizations, Order No. 2000-A,

international dimensions of the transmission grid in North America necessitate a legislative solution.

In addition, NERC currently is developing an interim plan for enforcing selected reliability standards in a fair and equitable manner pending enactment of legislation. This plan is based upon a workable, existing approach in the Western Systems Coordinating Council (WSCC), which in many respects would be superior to a Commission rulemaking at this juncture. A rulemaking, in fact, could be disruptive to these efforts by NERC. The NERC effort is based on the parties voluntarily entering into contracts committing them to comply with reliability standards. While this does not offer the long-term solution provided by the passage of reliability legislation, it would involve a broader scope of transmitting entities than are within the Commission's jurisdiction.

For these reasons, EEI urges DOE not to undertake a rulemaking and instead to focus its efforts, and those of the many interested parties, in passing reliability legislation as soon as possible in the 107<sup>th</sup> Congress.

## **RESPONSES TO QUESTIONS POSED IN THE NOI**

### **1. Is the existing arrangement of voluntary compliance with industry reliability rules sufficient to ensure reliability of the bulk power transmission system? If not, why not, and has reliability been jeopardized by violations of the existing bulk power reliability standards?**

As the Task Force, DOE's Power Outage Study Team, NERC's blue ribbon panel and the Commission have concluded, the existing arrangement of voluntary compliance with industry reliability rules is not sufficient to maintain bulk power system reliability in a restructured electric industry.<sup>3</sup> Among the reasons are the changing use of the

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65 Fed. Reg. 12088 (February 25, 2000), FERC Stats. & Regs. ¶ 31,092 (2000).

<sup>3</sup> "Reliable Power: Renewing the North American Electric Reliability Oversight System," Report of the Electric Reliability Panel to the North American Electric Reliability Council, (December 22, 1997) at

transmission system to facilitate regional bulk power markets, the increasing number of entities using the system, the explosion in the number of transactions on the system, the impact of unbundling and separation of functions, the increasing competitive pressures on all market participants, and the lack of any meaningful sanctions for non-compliance.

NERC and the regional councils have implemented a four-year Compliance Program. While NERC staff report that they continue to be encouraged by the fact that compliance with NERC standards is the “norm rather than the exception,” there are other instances where NERC reports that compliance is “being shunned.” NERC concludes that in such cases, passage of reliability legislation giving NERC the authority to enforce compliance is necessary.<sup>4</sup>

EEI believes that passage of legislation to establish NAERO will go a long way towards solving these problems. However, establishment of a mandatory system of reliability standards is not sufficient to ensure reliability. Reliability consists of two components: security (short-term operation of existing facilities) and adequacy (construction and maintenance of sufficient capacity). No amount of compliance with or enforcement of mandatory operational standards will ensure reliability unless there is adequate capacity in the generation and transmission infrastructure.

There is a critical need to expand the nation’s infrastructure to ensure adequate generation and transmission capacity. The need for generation capacity is urgent in some areas of the country. Among the causes cited by FERC staff in its report on the summer 2000 price abnormalities in California and the West was the fact that generation

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3; U.S. Department of Energy, “Report of the U.S. Department of Energy’s Power Outage Study Team,” (March 2000) at S-1 – S-3.

<sup>4</sup> North American Electric Reliability Council, “2000 NERC Compliance Enforcement Program,” (November 10, 2000) at 3.

resources were scarce. The staff report found that growth in demand had not been matched by increases in generation capacity.<sup>5</sup> In recent months, the situation in California has threatened the maintenance of reliable service as the California Independent System Operator has declared Stage 1, 2 and 3 emergencies.

There also have been few additions to the transmission grid in recent years, due in part to the problems of getting all the necessary regulatory approvals to build transmission as well as sufficient financial returns to attract capital for these projects. Dr. Eric Hirst reported on the need for new transmission in a study he completed for EEI in June 2000. He stated: “Although transmission is cheap (relative to generation) and of considerable value, expansion of the nation’s transmission grids has not kept pace with growth in demand for electricity.”<sup>6</sup> Evaluating data developed by NERC and others, Dr. Hirst concluded:

Existing transmission systems are strained, system operators are struggling to operate these systems closer to their physical limits, and new transmission facilities must be built soon to improve reliability margins and expand regional electricity trade.<sup>7</sup>

EEI believes that FERC actions on transmission rates of return and rate incentives as well as removal of federal legislative impediments, such as changes in the tax code that would promote the development of transmission companies, are necessary to foster needed investments in bulk power system infrastructure.

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<sup>5</sup> Staff Report to the Federal Energy Regulatory Commission on Western Markets and the Causes of the Summer 2000 Price Abnormalities, Part 1 of the Staff Report on U.S. Bulk Power Markets, November 1, 2000) at 5-3.

<sup>6</sup> Hirst, “Expanding U.S. Transmission Capacity,” (June, 2000) at 1.

<sup>7</sup> Id. at 12.

## **2. What can FERC do under existing authorities to address reliability concerns?**

The Commission has taken several actions within its authority to address reliability concerns. These include the Commission's request for comments earlier this year on both short-term and longer-term actions it can take to promote reliability.<sup>8</sup> The Commission has also acted within its jurisdiction to set parameters for procedures having both reliability and commercial implications, such as its orders on transmission loading relief (TLR) and capacity benefit margin (CBM). In addition, the Commission has included important responsibilities for RTOs in maintaining near-term reliability in Order No. 2000 as discussed in our response to Question 5, and could facilitate construction and upgrade of desperately needed transmission and generation facilities under its current authority.

As the Commission stated in its notice opening Docket No. EL00-75-000, while it does not have direct responsibility over reliability matters, it has been the Commission's consistent policy "to assure that the exercise of its ratemaking and other jurisdictional responsibilities supports and facilitates the continued high degree of reliability that has existed in the U.S."<sup>9</sup> In the notice, the Commission also stated that its "objective is not to become involved in the day-to-day operation of the electric grid or to duplicate or supplant the efforts of others in the industry that are engaged in inquiries about electric reliability issues."<sup>10</sup>

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<sup>8</sup> Notice of Interim Efforts to Support Industry Reliability Efforts, Docket No. EL00-75-000, May 17, 2000, 91 FERC ¶ 61,189 (2000). EEI filed comments on efforts to promote near-term reliability on June 2, 2000 and filed comments on June 30, 2000 on longer-term actions that the Commission can take to promote reliability.

<sup>9</sup> 91 FERC at 61,673.

<sup>10</sup> Id. 61,674.

On the issue of FERC's authority to authorize, implement and oversee a self-regulatory reliability organization as contemplated in the NAERO proposal, most telling is the Commission's own conclusion that it does not have such authority. In testimony on October 5, 1999 before the Subcommittee on Energy and Power of the House Commerce Committee, Commission Chairman James Hoecker stated:

The changes in the industry in recent years have created a need for new tools for ensuring the reliability of the transmission grid. In the past, reliability was addressed through the voluntary cooperation of transmission owners. Today, industry participants increasingly recognize that cooperative efforts among transmission-owning utilities may not be sufficient in a competitive environment, and that a mandatory system for ensuring the reliability of the grid is needed. This recognition has caused the industry to begin seeking the Commission's involvement on reliability issues, even though the Commission has not regulated system reliability historically and it has no express authority to do so. [emphasis supplied]<sup>11</sup>

Chairman Hoecker repeated the call for reliability legislation in testimony before the Senate Energy and Natural Resources Committee. He stated that legislation is needed to "establish mandatory reliability rules to protect the integrity of transmission service, relying on a self-regulating organization with appropriate Federal oversight and enforcement...."<sup>12</sup>

Through various orders dealing with reliability-related issues, the Commission has also emphasized that it is acting to fulfill its "traditional role of ensuring that rates, terms, and conditions of *jurisdictional service*, as distinct from reliability criteria, satisfy FPA [Federal Power Act] requirements."<sup>13</sup> Consistent with the Commission's own

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<sup>11</sup> Testimony of Chairman James J. Hoecker, Federal Energy Regulatory Commission before the Subcommittee on Energy and Power, Committee on Commerce, U.S. House of Representatives, October 5, 1999 at 11.

<sup>12</sup> Testimony of Chairman James J. Hoecker, Federal Energy Regulatory Commission before the Committee on Energy and Natural Resources, United States Senate, April 27, 2000 (Senate testimony) at 3.

<sup>13</sup> Western Systems Coordinating Council, 87 FERC ¶ 61,060 at 61, 234 (1999). Similarly, in addressing issues related to the New York State Reliability Council, the Commission based its jurisdiction in the matter on the fact that certain reliability provisions may affect the rates, terms and conditions of



expression of its authority, EEI believes that the Commission can deal with certain reliability-related issues that fall within its jurisdiction over the rates, terms and conditions of jurisdictional transmission service and power sales, as it has done to date.

The Commission's decision in approving WSCC's contract-based Reliability Management System (RMS) is an example of how it dealt with reliability-related issues within the context of its jurisdiction. While WSCC's RMS is considered a step in the right direction, it is not a sufficient substitute for federal reliability legislation because WSCC's voluntary approach does not include all grid users and allows members to exit if they no longer want to participate. About one-third of WSCC members currently participate in the RMS.

The Commission based its approval of the RMS, not on any assertion of direct authority over reliability, but as consistent with the Commission's "historical position" that "the responsibility for establishing mutually acceptable operating practices falls, in the first instance, on the owners and operators of interconnected systems."<sup>14</sup> In accepting the RMS for filing, the Commission stated that it did not intend to assume the role of developing reliability criteria. Instead, the Commission limited its role to considering the RMS reliability criteria "only to the extent needed to fulfill our traditional role of ensuring that rates, terms and conditions of *jurisdictional service*, as distinct from reliability criteria, satisfy FPA requirements."<sup>15</sup> FERC indicated that it would give substantial deference to WSCC in reliability matters and would take only a limited role in resolving disputes about failure to adhere to the WSCC reliability criteria.

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jurisdictional transmission and power sales services that are within its exclusive jurisdiction. It did not make a more general claim of jurisdiction as to reliability issues. New York State Reliability Council, 90 FERC ¶ 61,313 (2000).

<sup>14</sup> 87 FERC at 61,234.

Despite the Commission's efforts to deal with reliability-related issues within the limits of its current authority, its authority to establish a mandatory reliability scheme is at best questionable. One of the objectives of the stakeholder group, in which DOE participated, to draft the NAERO legislative proposal was to give FERC that clear authority and put it on a sound statutory basis. As stated above, the Secretary's own Task Force and the NERC blue ribbon panel of experts reached the same conclusion.

Even if one assumes, *arguendo*, that the Commission has some reliability jurisdiction, legislation is needed because the Commission clearly lacks authority, even with respect to the rates, terms and conditions of transmission service, over non-jurisdictional transmission providers. These entities, which include the federal power marketing administrations under DOE's jurisdiction, the Tennessee Valley Authority, electric cooperatives and state and municipal-owned utilities, own and operate between one-quarter and one-third of the nation's transmission grid. The NAERO proposal was crafted with the participation of many of these entities and explicitly gives the Commission jurisdiction over them for the purpose of ensuring compliance with the mandatory reliability standards established by NAERO. In addition, the NAERO proposal would include transmission system operators and users within the Electric Reliability Council of Texas (ERCOT), which is outside the Commission's plenary jurisdiction under the Federal Power Act.

The NAERO proposal also was drafted with particular sensitivity to the international aspects of the transmission system in North America. The Commission does not have jurisdiction over transmission providers in Canada and Mexico. The NAERO proposal contemplates the establishment of an international self-regulatory

reliability organization that recognizes the sovereignty of the nations involved and the jurisdictional complexities in establishing a multi-national organization.

**3. If FERC has the authority to establish and enforce reliability standards, may FERC delegate such authority to a self-regulating reliability organization? Should it do so?**

As indicated in the response to Question 2, the Commission does not have the authority to establish and enforce mandatory reliability standards. Moreover, even if FERC had such authority, it lacks the authority to delegate such activities to a private organization. However, the NAERO proposal would give the Commission the authority to establish and enforce mandatory reliability standards and provides that FERC can delegate its authority to the Electric Reliability Organization (ERO), which will carry out its delegated duties subject to FERC oversight. In addition, establishment of a self-regulatory reliability organization, in the absence of legislative protection, may expose its members and participants to antitrust liability. The Commission cannot otherwise confer immunity to the participants involved in the ERO's activities. Lack of antitrust protection could cripple the organization.

Under the NAERO proposal, the ERO could further delegate specified duties to affiliated regional reliability entities (ARREs) that meet the statutory criteria. The scheme carefully established in the NAERO proposal recognizes that while there is a need for national organization standards established by the ERO, regional variations would also be recognized, following statutory processes. The legislation also provides considerable deference to separate interconnections, as the electrical effects of events in one interconnection do not affect systems in other interconnections. It is also designed to accommodate the development of variances that recognize regional differences, such as

the technical, operational and organizational differences that exist between the Eastern and Western Interconnections.

**4. Are there elements in CECA, or other electric reliability legislative language, which can, with or without modification, be used in a rulemaking?**

As discussed above, the reliability language in CECA is an earlier version of the NAERO proposal. The most recent version of the NAERO proposal is embodied in the Wynn bill, H.R. 4941, introduced in the 106<sup>th</sup> Congress. EEI believes that the Wynn bill should be the starting point for action in the 107<sup>th</sup> Congress. Despite the improvements made in the Wynn bill, neither it nor any legislative proposal can be “cut and pasted” into a rulemaking proposal, because, as discussed above, the Commission’s authority in this area is very limited. In addition, as noted in our response to Question 3, the attempt to establish a NAERO-like scheme by regulation would leave out significant parts of the nation’s transmission grid – ERCOT and other non-jurisdictional transmission providers. It would also exacerbate problems in working out the international aspects of the proposed organization.

Concerns over possible antitrust exposure for those participating in developing national reliability standards was one of the main reasons for establishing the stakeholder process that developed the NAERO proposal. Attempting to implement a self-regulatory reliability organization by regulation would not confer the antitrust protection that is needed and that is carefully delineated in CECA and in the NAERO proposal.

Legislation is also needed to clarify the federal and state jurisdictional issues and reliability responsibilities that are a major issue in establishing a mandatory reliability scheme. Following extensive negotiations, a provision to deal with these concerns was drafted and accepted by the NAERO stakeholder group, including the National

Association of Regulatory Utility Commissioners (NARUC). The so-called “state savings clause” was drafted after CECA was introduced and is included in later versions of the NAERO proposal, including H.R. 4941.

**5. What should the relationship be between Regional Transmission Organizations, as advanced in FERC Order No. 2000, 65 FR 809 (January 6, 2000), FERC Stats. & Regs. ¶ 31,089 (2000), and an Electric Reliability Organization as proposed in CECA?**

In Order No. 2000, the Commission concluded that the RTO must have exclusive authority for maintaining the short-term reliability of the grid that it operates. The Commission clarified that the term “short-term” is intended to cover transmission reliability responsibilities short of grid-capacity enhancement.<sup>16</sup>

In its notice of proposed rulemaking that culminated in Order No. 2000, the Commission expressed a potential concern regarding an RTO’s implementation of reliability standards established by another entity. The Commission identified two specific concerns: 1) regional or sub-regional reliability groups may not be as independent from market participants as RTOs; and 2) almost every reliability standard will have a commercial consequence.

After receiving extensive comments on this issue, the Commission concluded in Order No. 2000 that the RTO must perform its functions consistent with established NERC (or its successor) reliability standards, and notify the commission immediately if implementation of these or any other externally established reliability standards would prevent it from meeting its obligation to provide reliable, non-discriminatory transmission service.<sup>17</sup>

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<sup>16</sup> Order No. 2000 at 31,103.

<sup>17</sup> Id. at 31,106.

The Commission, therefore, recognized that an organization such as NERC or its successor would establish reliability standards, while at the same time anticipating the need to reconcile potential conflicts in the implementation of such standards by RTOs. Following the issuance of Order No. 2000, members of the NAERO stakeholder group, joined by representatives of several ISOs, including the PJM and California ISOs, and of several entities intending to seek approval as RTOs pursuant to Order No. 2000, developed legislative language to acknowledge the directive in Order No. 2000. During the course of these negotiations, Commission staff was also consulted for its views on how the relationship between the ERO and RTOs should be articulated in the NAERO legislative language.

That language is included in H.R. 4941. The RTO provision in H.R. 4941 takes the approach that, since the Commission ultimately must approve standards established by the ERO as well as the tariff and other terms of service of each RTO, the Commission ultimately should be the arbiter of potential conflicts. Until a conflict is resolved, the RTO must comply, as required by the Federal Power Act, with the terms of its existing tariff.

Under H.R. 4941, each RTO is to be responsible for maintaining short-term reliability of the grid it operates, consistent with ERO standards. During the process of approving proposed ERO standards, an RTO is to report to FERC whether the proposed standard may hinder or conflict with any terms in its Commission-accepted or approved tariffs, contracts, or rate schedules. FERC is to determine whether a conflict exists and can order that the RTO modify the tariff or other provision in question, or FERC can send the ERO standard back for modification. If the Commission orders the RTO to make an

amended filing changing the disputed provision, the RTO must do so expeditiously, but the RTO must comply with the original tariff or provision until the new one is accepted or approved by FERC.

An RTO can also request FERC to resolve conflicts that become apparent after an ERO standard is approved under a similar process as set forth for proposed standards. There are also provisions detailing how RTO-adopted standards will apply during a transition period extending until six months after the ERO is established and variance procedures are adopted.

While refinements to this language may be made before consideration in the 107<sup>th</sup> Congress, H.R. 4941 acknowledges the direction set forth in Order No. 2000 and provides a sound basis for appropriate legislative language to clarify and harmonize the roles of the ERO and RTOs.<sup>18</sup>

## **6. How should the responsibilities and roles of FERC and the States be addressed in a rulemaking?**

The changing nature of the electric utility industry has highlighted the need to clarify certain aspects of federal and state jurisdiction. The issue of federal and state jurisdiction and responsibilities in the area of reliability must be addressed in legislation. It cannot be done by regulation. As EEI has indicated above, legislation is required to provide the Commission with needed reliability authority and to authorize the establishment of the ERO. One of the important aspects of that legislation will be to resolve the federal and state jurisdictional issues. There also may be a need to make

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<sup>18</sup> The manner in which each RTO will carry out its reliability responsibilities under Order No. 2000 will be before the Commission as it reviews each of the filings by entities seeking recognition as an RTO. This will need to be coordinated with the development of other regional entities. For example, in the West, many organizations are proposing to form the Western Interconnection Organization (WIO), which will perform many of the reliability functions currently being performed by the WSCC and Regional

clarifying changes to other provisions of the Federal Power Act. This cannot be done by a rulemaking.

After the drafting of the original NAERO proposal, representatives of several state public utility commissions and of NARUC urged the need to clarify federal and state roles. Negotiations to resolve this issue were undertaken. Among the issues debated was the potential conflict between the need for FERC jurisdiction over the ERO and reliability standards established for the interstate bulk power transmission grid and the states' concern that state officials "get the telephone calls when the lights go out."

As a result of these discussions, compromise legislative language was worked out and was included in subsequent versions of the NAERO legislative proposal, including S. 2071 and H.R. 4941. The general approach of the "state savings clause" is to preserve state authority to ensure the reliability of local distribution facilities in the state, except where the exercise of such authority unreasonably impairs the reliability of the bulk power system. The savings clause language also reserves to the states the authority to set standards for adequacy and safety of electricity supply. CECA does not contain the state savings clause.

## **7. Recognizing the international nature of the interconnected transmission grid, how should implementation of mandatory reliability standards be coordinated with Canada and Mexico?**

Representatives of Canadian utilities and of governmental authorities participated in the stakeholder group that developed the NAERO proposal. One of the clear objectives was the need to establish an international self-regulatory reliability organization subject to FERC oversight and enforcement authority in the United States

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Transmission Associations. In addition, The WIO will seek to be designated as a qualified Interconnection-wide Affiliated Regional Reliability Entity under the NAERO legislation, should it be passed.



without infringing on the sovereignty of Canada and Mexico. The NAERO proposal, as reflected in H.R. 4941, provides that the ERO shall take all appropriate steps to gain recognition in Canada and Mexico. It also stipulates that the United States shall use its best efforts to enter into international agreements with Canada and Mexico to provide for effective compliance with organization standards and the ERO's effectiveness in carrying out its mission and responsibilities. Such provisions must be authorized by statute. An agency, such as the Commission, cannot direct that international agreements be entered into. As with the other provisions of the NAERO proposal, legislation, not a rulemaking, is the appropriate means to address international reliability issues.

Respectfully submitted,

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